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European Commission
Rue de la Loi / Wetstraat 200
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SUBJECT: THE HIGH-LEVEL ROUND TABLE ON THE IMPLEMENTATION OF THE CHEMICALS STRATEGY FOR SUSTAINABILITY

Dear Commissioners,

Thank you for an insightful and fruitful first discussion at the High-Level Roundtable on 5 May. We were pleased to see a very high level of enthusiasm among all participants, which gives us the confidence that together we can help implement the Chemicals Strategy for Sustainability in a way that will support the achievement of the European Green Deal objectives.

We also appreciate a close collaboration between DG Environment and DG Grow teams on this topic. It is clear that this Strategy cannot be implemented in isolation from other important EU policies, including the updated EU Industrial Strategy, and a stronger focus on SMEs. With all our sectors facing the “twin green and digital” transition, promoting policy coherence and ensuring that all pieces of EU legislation support each other will create a strong business case for investments into more sustainable and innovative products manufactured by our sectors on the European soil.

As we all reiterated during the meeting, one of the key questions that the industry is grappling with is **which policies need to be prioritised to accelerate this Strategy towards success**. Another important consideration should be given to a central role of SMEs in the transition process and their delicate situation, which needs to be addressed with extraordinary care in the upcoming discussions, along with the need to consider specificities of each value chain in this process.

We were delighted to hear during the discussion that almost all participants agreed **that strengthening enforcement of already existing EU law would make an enormous difference to public health and environment**. We have one of the most advanced chemicals and product safety laws in the world. Let us build on this strong foundation by doubling down on enforcement, primarily in imported products. We cannot stress this enough that enforcement would also **reassure those who comply with legislation that their competitiveness will remain safeguarded**.

A key aspect of the Chemicals Strategy for Sustainability is to bring coherence to the existing policy framework. We must therefore ensure that **its implementation helps, not hinders, the successful delivery of Europe’s Green Deal and strategic autonomy**. The industry is ready to play its role in supporting this work, aiding the transition towards a climate-neutral and circular economy.

We also urge you to prioritise the definition of what constitutes “Safe and Sustainable”, taking into account a **holistic life cycle approach** and ensuring that **safety is not compromised for the sake of sustainability**. Having a clear definition and financing mechanisms for commercialisation of Safe-and Sustainable-by-Design substances, materials and products will introduce a clear market incentive, which will always drive growth of industrial change faster than by introducing wider bans and restrictions.

We look forward to hearing from you about the next steps that the European Commission plans to take for all these matters.

Sincerely yours,

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